



THE CITY OF NEW YORK
LAW DEPARTMENT
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January 19, 2024

BY ECF

Honorable Stewart D. Aaron
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Mindy Espinal vs. City of New York, et al.*, 23 CV 6171 (ALC) (SDA)

Your Honor:

I am a Senior Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and a supervising attorney in the Special Federal Litigation Division. For the reasons set forth below, I write to respectfully request a thirty (30) day extension of time for all pending deadlines in this case, including today's deadline to respond to Plaintiff's settlement demand. Upon information and belief, this is the second request for an extension of time to respond to Plaintiff's settlement demand and the mediation trigger deadline, however, the first request for all other deadlines. The undersigned conferred with Plaintiff's counsel, Vik Pawar, who consents to this request.

As an initial matter, this Office sincerely apologizes for the instant request, as we understand that the Court indicated that the deadline to respond to Plaintiff's demand would not be extended without good cause. The reason for this request is that yesterday, the undersigned was informed by Assistant Corporation Counsel Thomas Lai, the attorney who has been handling the defense of this case, that he is unexpectedly taking leave for the next several weeks and we are therefore in the process of reassigning the matter. Upon conferring with Plaintiff's counsel, and to the extent the Court grants the within request, it is our hope that counsel for the parties can use the next thirty days to attempt to resolve the matter amongst ourselves and without the need for mediation.

For the reasons set forth above, it is respectfully requested that the following deadlines be extended an additional thirty days, as set forth below:

- Deadline to respond to Plaintiff's Demand: from January 19, 2024 to February 19, 2024;
- Deadline for defendants Bonilla, Flynn, Guzman, Rosado-Duran to respond to the complaint: from January 29, 2024 to February 28, 2024;
- Mediation Trigger deadline: from February 23, 2024 to March 24, 2024;

Additionally, in light of the above requests, it is also respectfully requested that the initial conference currently scheduled for 11:00 a.m. on February 21, 2024 be adjourned to a date and time convenient for the Court after March 24, 2024.

I thank the Court for its time and consideration of this request.

Respectfully submitted,

/s/ Alexandra Corsi

Alexandra Corsi
Senior Counsel
Special Federal Litigation Division
New York City Law Department

cc: **By ECF**
Vik Pawar, Esq.
Attorney for Plaintiff

Application GRANTED. The requested deadline extensions are granted. In addition, the Initial Pretrial Conference currently scheduled for February 21, 2024 is adjourned until March 26, 2024 at 11:00 a.m. The conference shall be conducted using Microsoft Teams (audio only). At the scheduled time, the parties shall call 646-453-4442 and enter conference ID 383 255 872#. SO ORDERED.

Dated: January 19, 2024

